

1 LISA A. MCCLANE, ESQ.
2 Nevada Bar No. 10139
3 **JACKSON LEWIS P.C.**
4 300 S. Fourth Street, Suite 900
5 Las Vegas, Nevada 89101
6 Tel: (702) 921-2460
7 Fax: (702) 921-2461
8 E-Mail: lisa.mcclane@jacksonlewis.com

6 || *Attorneys for Defendant
Pro-Vigil, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11 JULIUS CZUDAR,
12 Plaintiff,
13 vs.
14 PRO-VIGIL, INC., a foreign Corporation
15 headquartered in Texas,
Defendant.

Case No.: 2:19-cv-01784-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
RESPOND TO PLAINTIFF'S
COMPLAINT**

(Second Request)

17 IT IS HEREBY STIPULATED by and between Plaintiff Julius Czudar (“Plaintiff”),
18 through his counsel Mullins & Trenchak, Attorneys at Law, and Defendant Pro-Vigil, Inc.,
19 (“Defendant”), through its counsel Jackson Lewis P.C., that Defendant shall have up to and
20 including Tuesday, December 17, 2019, in which to respond to Plaintiff’s Complaint. This
21 Stipulation is submitted and based upon the following:

22 1. That Defendant's answer or response is currently due on December 3, 2019.

23 2. That this is the second request for an extension of time for Defendant to respond to

24 Plaintiff's Complaint.

25 3. That such an extension is necessary because defense counsel has been out of the

26 office due to familial medical issues and counsel need an opportunity to discuss possible resolution

27 of issues which may alleviate the need for an anticipated motion to dismiss.

28 4. That this request is made in good faith and not for the purpose of delay.

1 5. That nothing in this Stipulation, nor the fact of entering to the same, shall be
2 construed as waiving any claim and/or defense held by any party.
3

4 Dated this 2ndth day of December, 2019.
5

6 MULLINS & TRENCHAK, ATTORNEYS AT JACKSON LEWIS P.C.
7 LAW
8

9 */s/ Philip J. Trenchak* _____
10 PHILIP J. TRENCHAK, ESQ.
11 Nevada State Bar No. 9924
12 VICTORIA C. MULLINS, ESQ.
13 Nevada State Bar No. 13546
14 1614 S. Maryland Parkway
15 Las Vegas, Nevada 89104
16

17 *Attorneys for Plaintiff*
18 *Julius Czudar*
19

20 */s/ Lisa A. McClane* _____
21 LISA A. MCCLANE, ESQ.
22 Nevada Bar No. 10139
23 300 S. Fourth Street, Ste. 900
24 Las Vegas, Nevada 89101
25

26 *Attorneys for Defendant*
27 Pro-Vigil, Inc
28

13 **ORDER**

14 IT IS SO ORDERED:
15

16 
17 United States Magistrate Judge
18

19 Dated: December 2, 2019
20

21 4851-5037-0989, v. 2
22